

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2020-84-T

Application of)	
)	
ABA Moving and Storage, Inc. d/b/a)	MOTION FOR PERMISSION TO
Two Men and a Truck)	PRESENT SHIPPER WITNESS
)	TESTIMONY BY AFFIDAVIT
for a Class E (Household Goods))	
Certificate of Public Convenience and)	
Necessity for Operation of a Motor)	
Vehicle)	

ABA Moving and Storage, Inc. d/b/a Two Men and a Truck ("ABA Moving" or "Applicant") moves for permission to present the testimony of its shipper witness by affidavit. The Commission's regulation concerning the proof required to support an application for a Certificate of Public and Convenience and Necessity for a Class E mover of household goods with statewide authority is found in S.C. Code Regs. 103-333 (the "Regulation").

Regarding the testimony of shipper witnesses, the Regulation states:

PC&N (Household Goods or Hazardous Waste for Disposal). An application for a Certificate of PC&N or to amend a Certificate of PC&N to operate as a carrier of household goods or hazardous waste for disposal by motor vehicle may be approved upon a showing that the applicant is fit, willing, and able to appropriately perform the proposed service and that public convenience and necessity are not already being served in the territory by existing authorized service. The public convenience and necessity criterion must be shown by the use of shipper witnesses, if the applicant applies for authority for more than three contiguous counties. If the commission determines that the public convenience and necessity is already being served, the commission may deny the application. The following criteria should be used by the commission in determining that an applicant for motor carrier operating authority is fit, willing, and able to provide the requested service to the public:

S.C. Code Regs. 103-133.1 (emphasis added)

In the interest of administrative economy (judicial economy in the administrative law context), the Applicant requests that the Commission allow the regulation's requirement of "use of a

shipper witness" to be satisfied by the submission of an affidavit.

The Office of Regulatory Staff (the only party other than the Applicant in this Docket) would have the right to contest the adequacy of an affidavit. Counsel for the Applicant has discussed this Motion with counsel for the ORS, and the ORS does not object to the relief sought herein.

Therefore, Applicant respectfully requests the Commission allow it to present the testimony of its shipper witness by affidavit. The Applicant attaches the Shipper Witness Affidavit¹ of Greg Savitski as **Exhibit One** hereto.

ADAMS AND REESE, LLP

s/ John J. Pringle, Jr.
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Attorneys for the Applicant

Columbia, South Carolina
May 1, 2020.

¹ Also known as a "Terrini Affidavit."

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ABA Moving and Storage, Inc. d/b/a)	
Two Men and a Truck)	AFFIDAVIT OF GREG SAVITSKI
)	
for a Class E (Household Goods))	
Certificate of Public Convenience and)	
Necessity for Operation of a Motor)	
Vehicle)	

The Affiant, being duly sworn, states the following:

1. My name is Greg Savitski, and my business address is 854 Kingswood Drive, Conway, SC 29526. I have testified before the Commission previously.
2. I am providing this Affidavit in support of the application of ABA Moving and Storage, Inc. d/b/a Two Men and a Truck ("ABA Moving") for a Class E Household Goods Certificate of Public Convenience and Necessity to transport household goods statewide within the State of South Carolina.
3. I am the Vice President of Reliable Services Group, Incorporated d/b/a Two Men and a Truck ("Reliable Services Group"). I have been with Reliable Services Group since its inception in 1998. I have been involved in all aspects of running a moving company including performing moves, doing estimates, dealing with damage claims and all other areas of running a company on a daily basis.
4. In my role as Vice President of Reliable Services Group, I am knowledgeable and aware of the intrastate household goods moves taking place in the State of South Carolina. Reliable Services Group holds a Certificate of Public Convenience and Necessity No. 9864-C authorizing it to provide household goods moves on a statewide basis.
5. At the current time, Reliable Services Group has offices in both Charleston County (2410 Air Park Road, North Charleston) and Horry County (854 Kingswood Drive, Conway).
6. ABA Moving intends to operate the Charleston County office currently owned and operated by Reliable Services Group. ABA Moving intends to purchase certain equipment (including vehicles) from Reliable Services Group, and intends to employ

those Reliable Services Group employees located in Charleston County. Accordingly, ABA Moving intends to operate out of the current Reliable Services Group Charleston County location.

7. Currently there are approximately 40 employees working out of the Reliable Services Group Charleston County Office. In addition, 15 trucks operate out of this Charleston County Office.
8. In 2019, 2,616 intrastate moves were performed out of the Reliable Services Group Charleston County office. In 2018, 2,733 intrastate moves were performed out of this office.
9. Additionally, 510 intrastate moves were performed out of the Reliable Services Group Charleston County office in the first quarter of 2020. In 2020, the Charleston County office has conducted intrastate moves that originated or terminated in Anderson, Florence, Newberry, Spartanburg, and York counties, just to name a few.
10. The Reliable Services Group Horry County location does not directly compete with the Charleston County location, and will not directly compete with ABA Moving. It is not cost effective for customers to hire a company located in the Horry County market and pay a travel charge- just to be moved somewhere within the Charleston County market.
11. According to the Census Bureau SC ranks #6th highest in percent population growth (1.3%) in the nation from 2018 to 2019. During that time period, South Carolina's population grew by 64,558. (<https://www.census.gov/newsroom/press-releases/2019/popest-nation.html>).
12. In addition, according to the Charleston Regional Competitiveness Center, 26 people move to the Charleston area every day. (<https://www.crda.org/local-data/>).
13. The Upstate SC Alliance reports that the Upstate SC Region experienced population growth of 1.4% from 2018 to 2019, a growth rate greater than that for the entire State of South Carolina (1.3%). (<https://www.upstatescalliance.com/data-center-population/>)
14. The Central Midlands Council of Governments estimates that population of the Central Midlands region of South Carolina (Richland, Lexington, Newberry and Fairfield Counties) is expected to grow by more than 525,000 residents (62.6%) between 2020 and 2050. By 2050, it is projected that the population of the four-county Central Midlands region will total almost 1.4 million people. http://centralmidlands.org/wp-content/uploads/CMCOG-2050-Population-Projections-Report_final.pdf
15. As a manager of intrastate household goods moves and an observer of the ongoing residential growth, economic growth and construction in the Low Country, as well as my knowledge of population and construction trends statewide, it is my opinion that there is substantial demand for intrastate moving services in SC.

16. There is a present need for the statewide intrastate moving services in South Carolina that ABA Moving seeks to provide.
17. It is my opinion that there is enough business to go around, in the event that ABA Moving is granted the authority to provide moving services statewide.

AND THAT IS ALL THE AFFIANT HAS TO SAY.



Greg Savitski

SWORN TO AND SUBSCRIBED BEFORE ME

This 1st day of May, 2020.



Notary Public for South Carolina

My commission expires: March 5, 2022

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day the **Motion for Permission to Present Shipper Witness Testimony by Affidavit** via electronic mail service as follows:

Carri Grube-Lybarker
clybarker@scconsumer.gov

Becky Dover
bdover@scconsumer.gov

Jenny Pittman
jpittman@regstaff.sc.gov

s/John J. Pringle, Jr.

May 1, 2020
Columbia, South Carolina